

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Implementation of the Telecommunications)	CC Docket No. 96-115
Act of 1996:)	
)	
Telecommunications Carriers' Use of)	
Customer Proprietary Network Information)	
and other Consumer Information;)	
)	
Petition for Rulemaking to Enhance Security)	RM-11277
and Authentication Standards for Access to)	
Customer Proprietary Network Information)	

MOTION FOR EXTENSION OF TIME

Pursuant to Section 1.46 of the Federal Communications Commission's ("Commission") rules,¹ the National Association of State Utility Consumer Advocates, the Pennsylvania Public Utilities Commission and the Texas Office of Public Utilities Counsel (collectively, "Movants") hereby move the Commission to enter an order extending the period for all interested parties to file reply comments in this proceeding. Movants seek a 14-day extension of the reply comment deadline, to June 2, 2006. This brief extension of time will permit all parties to file more complete responses to issues raised in initial comments filed with the Commission, and will not prejudice any interested parties.

On February 14, 2006, the Commission issued a Notice of Proposed Rulemaking ("NPRM") in the above-captioned proceeding setting forth numerous issues to be

¹ 47 C.F.R. § 1.46

addressed in comments and reply comments. The NPRM established a comment deadline of 30 days after publication of the NPRM in the Federal Register and a reply comment deadline of 60 days after Federal Register publication. The NPRM was published in the Federal Register on March 15, 2006;² thus comments were originally due on April 14, 2006 and reply comments on May 15, 2006.

On April 11, 2006, the Wireline Competition Bureau granted a motion for extension of time that had been filed on April 10, 2006 by the United States Department of Justice.³ The Bureau extended the deadline for filing comments by two weeks, to April 28, 2006. The Bureau, however, extended the deadline for filing reply comments by only four days, to May 19, 2006. Thus, instead of having 30 days to reply to comments, as the NPRM originally allowed, commenting parties now have only 21 days for replies. The Public Notice did not explain why the reply comment deadline was extended only four days.

More than 50 comments have been filed in this proceeding, by a wide range of interests: Regional Bell Operating Companies, small local telephone companies, competitive local telephone companies, wireless companies, the cable industry, Internet telephony interests, consumer organizations and state and federal government agencies. Each brings a unique perspective to the issues presented in the NPRM.

In light of the important legal, economic and policy issues raised in the NPRM, the abbreviated time period established in the Public Notice is inadequate for commenting parties to analyze the comments that have been filed and to provide the Commission with reasoned responses to the points raised in the comments. There is also

² FCC 06-10, 71 Fed. Reg. 13317 (March 15, 2006).

³ Public Notice, DA 06-840 (April 11, 2006) ("Public Notice").

no real justification for cutting the reply comment period by one-third. Although the Commission is rightly concerned about addressing the issues raised in the NPRM in a timely manner, the Commission is also under no statutory or other deadline that requires a shorter reply comment period.

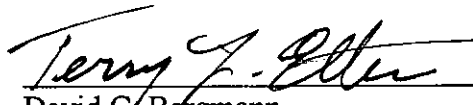
The brief, 14-day extension sought by Movants will greatly facilitate the development of a complete record for the Commission's review. The modest extension sought by Movants will not prejudice any party. Indeed, all interested parties should benefit from the additional time to file reply comments. Moreover, although it is Commission policy that extensions of time are not routinely granted,⁴ the Commission has granted extensions of time to file reply comments in similar circumstances.⁵ The grant of additional time for reply comments, as requested by Movants, will likewise allow interested parties a meaningful opportunity to respond to issues raised in the comments and will assist the Commission in rendering a decision based on a complete record.

For all the foregoing reasons, Movants respectfully request that the Commission grant this motion for a 14-day extension of the period for filing reply comments, and extend the reply comment deadline to June 2, 2006.

⁴ See 47 C.F.R. § 1.46(a).

⁵ See, e.g., *In the Matter of Inquiry Regarding Carrier Current Systems, Including Broadband over Power Line Systems*, ET Docket No. 03-104, Order Granting an Extension of Time to File Reply Comments, 18 FCC Rcd 15924 (2003) (granting 14-day extension of reply comment deadline because of the large number of comments received and the complexity of the subject matter).

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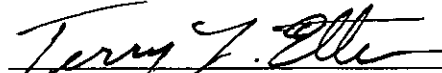
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CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of May 2006, I caused true and correct copies of the foregoing Motion for Extension of Time to be served on all parties listed below by electronic filing or first-class United States Mail, postage prepaid.



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